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Via ECF

Hon. Cecelia G. Morris
United States Bankruptcy Court
355 Main Street
Poughkeepsie, New York 12601-3315

Re: *In re Fairfield Sentry Ltd (In Liquidation)*, Case Nos. 10-3626, 10-3627, 10-3635, 10-3636, 11-1579, 11-1617, 12-1551

Dear Judge Morris:

We write on behalf of the Fairfield Liquidators, jointly with defendants BGL BNP Paribas S.A. (*f/k/a* BNP Paribas Luxembourg SA), BNP Paribas Securities Services Luxembourg, BNP Paribas (Suisse) SA (*f/k/a* BNP Paribas (Suisse) SA Ex Fortis and BNP Paribas (Suisse) SA Private), BNP Paribas Fortis (*f/k/a* Fortis Bank SA/NV), BNP Paribas Securities Nominees Ltd. (*a/k/a* Harrier Holdings Ltd.), and BNP Paribas España (*f/k/a* Fortis Bank (España)) (collectively, the “BNP Defendants”), to update the Court regarding the discovery dispute raised in the Liquidators’ October 14, 2022 Letter (10-ap-3636, ECF No. 1033). *See also* BNP Defs.’ Oct. 17, 2022 Ltr. (10-ap-3636, ECF No. 1034).

The Liquidators sought the Court’s intervention in scheduling Rule 30(b)(6) depositions of the BNP Defendants and a briefing schedule for the Liquidators’ anticipated motions for sanctions against the BNP Defendants under Rule 37(e). Ltrs.’ Oct. 14, 2022 Ltr. On October 18, 2022, the Court set the dispute to be heard during the November 16, 2022 Fairfield omnibus hearing. *See* 10-ap-3636, ECF No. 1036.

The parties have now reached an agreement on the relevant deadlines and, accordingly, no longer have a dispute requiring the Court’s intervention. The parties respectfully request that the Court remove the November 16, 2022 hearing on these issues, and further request that the Court enter the attached proposed scheduling order reflecting the parties’ jointly agreed-upon deadlines for the depositions and briefing the Rule 37(e) motion.

Respectfully submitted,

/s/ Joshua S. Margolin

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